

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Boulevard, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant  
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY  
20  
21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)  
23

24 Gary L. Compton, State Bar No. 1652  
25 2950 E. Flamingo Road, Suite L  
26 Las Vegas, Nevada 89121  
27

28 **UNITED STATES DISTRICT COURT**  
29 **DISTRICT OF NEVADA**

30 JPMORGAN CHASE BANK, N.A.,

31 Plaintiff,

32 vs.

33 FIDELITY NATIONAL TITLE GROUP,  
34 INC., et al.,

35 Defendants.

Case No.: 2:20-cv-02188-APG-BNW

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO MOTION FOR  
REMAND [ECF No. 10] AND MOTION  
FOR FEES AND COSTS [ECF No. 11]**

**(First Request)**

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff JPMorgan  
2 Chase Bank N.A.’s (“JPMorgan”) (collectively, the “Parties”), by and through their counsel of  
3 record, hereby stipulate and agree as follows:

- 4 1. On December 1, 2020, JPMorgan filed its Complaint in the Eighth Judicial District  
5 Court, Case No. A-20-825633-C [ECF No. 1-1];
- 6 2. On December 1, 2020, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 7 3. On December 31, 2020, JPMorgan filed a Motion for Remand [ECF No. 10];
- 8 4. On December 31, 2020, JPMorgan filed a Motion for Costs and Fees [ECF No. 11];
- 9 5. Fidelity’s deadline to respond to JPMorgan’s Motion for Remand and Motion for  
10 Costs and Fees is currently January 14, 2021;
- 11 6. Fidelity’s counsel is requesting an extension until Thursday, January 28, 2021, to file  
12 its response to the pending Motion for Remand and Motion for Costs and Fees;
- 13 7. Fidelity requests a brief extension of time to respond to the Motion for Remand and  
14 Motion for Costs and Fees to afford Fidelity additional time to respond to the legal  
15 arguments set forth in JPMorgan’s motions;
- 16 8. JPMorgan does not oppose the requested extension;
- 17 9. This is the first request for an extension which is made in good faith and not for  
18 purposes of delay;

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1           **IT IS SO STIPULATED** that Fidelity's deadline to respond to JPMorgan's Motion for  
2 Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended through  
3 and including January 28, 2021.

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5 Dated: January 12, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
8 Attorneys for Defendant FIDELITY  
9 NATIONAL TITLE INSURANCE  
COMPANY

10  
11 Dated: January 12, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
13 Attorneys for Defendant FIDELITY  
14 NATIONAL TITLE INSURANCE  
COMPANY

15 Dated: January 21, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Lindsay D. Robbins  
LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff WELLS FARGO  
18 BANK, N.A.

19 **IT IS SO ORDERED:**

20  
21 Dated: January 12, 2021

22 By:   
UNITED STATES JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on January 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

